

THE HONORABLE BENJAMIN SETTLE

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

CLYDE RAY SPENCER,

Plaintiff,

v.

JAMES M. PETERS, et al.,

Defendants.

NO. C11 5424 BHS

DECLARATION OF GUY
BOGDANOVICH IN SUPPORT OF
DEFENDANTS' MOTION FOR
ATTORNEY FEES FOR MOTION
TO STRIKE SECOND
SUPPLEMENTAL DISCLOSURE

NOTE ON MOTION CALENDAR:
Friday, March 22, 2013

PURSUANT TO 28 U.S.C. § 1746, Guy Bogdanovich declares as follows:

1. I am competent to testify in all respects, and make this declaration from personal knowledge. I am the attorney of record for defendant Sharon Krause in the above-entitled action.

2. I received my Juris Doctor degree, Cum Laude, from the University of Puget Sound School of Law in May 1984, and was admitted to the Washington State Bar in November 1984. I have also been admitted to practice in the United States District Court for the Eastern and Western Districts of Washington, the United States Court of Appeals for the Ninth Circuit, and the Oregon State Bar. I practiced civil litigation in the Tort Claims Division of the Washington State Attorney General's Office from

DECLARATION OF GUY BOGDANOVICH
IN SUPPORT OF DEFENDANTS' MOTION FOR
ATTORNEY FEES FOR MOTION TO STRIKE
SECOND SUPPLEMENTAL DISCLOSURE - 1
Cause No: C11-5424 BHS

LAW, LYMAN, DANIEL,
KAMERRER & BOGDANOVICH, P.S.
ATTORNEYS AT LAW
2674 RW JOHNSON BLVD SW, TUMWATER, WA 98512
PO BOX 11880, OLYMPIA, WA 98508-1880
(360) 754-3480 FAX: (360) 357-3511

1 November 1984 through December 1990, where I defended the State of Washington
 2 and its employees in various civil liability lawsuits in state and federal court. In
 3 December 1990 I joined my current law firm of Law, Lyman, Daniel, Kamerrer &
 4 Bogdanovich, P.S., where I have practiced continuously since. Our firm works
 5 primarily in the defense of cities and counties in the State of Washington and their
 6 employees in civil lawsuits. During my approximately 28 years of practice I have tried
 7 cases in the Superior Courts for King County, Snohomish County, Grant County,
 8 Thurston County, Cowlitz County, Grays Harbor County, and Jefferson County, and in
 9 the United States District Court for the Western District of Washington at Tacoma. My
 10 hourly rate of \$205 is consistent with and in fact on the lower end of the range of rates
 11 charged by attorneys with comparable experience and skill in western Washington.

12 3. I spent 3.6 hours drafting Defendants' Motion to Strike Plaintiff's Second
 13 Supplemental Disclosure Pursuant to Fed.R.Civ.P. 26(a)(1) and to Bar Testimony
 14 (Document 143), the Proposed Order Granting the same (Document 143-1) and the
 15 supporting Declaration of Guy Bogdanovich (Document 144). I spent 3.9 hours
 16 reviewing Plaintiff's Response to Defendants' Motion to Strike Plaintiff's Second
 17 Supplemental Disclosure Pursuant to Fed.R.Civ.P. 26(a)(1) and to Bar Testimony
 18 (Document 145) and the supporting Declaration of Kathleen T. Zellner (Document 146)
 19 and Declaration of Menona D. Landrum (Document 147), and drafting Defendants'
 20 Reply to Response to Motion to Strike Plaintiff's Second Supplemental Disclosure
 21 Pursuant to Fed.R.Civ.P. 26(a)(1) and to Bar Testimony (Document 148).

22 4. The 7.5 hours I spent on the above-identified tasks was necessary and
 23 reasonable for the work accomplished. At \$205 per hour, the \$1,537.50 total billed for
 24 fees is reasonable. My representation of defendant Sharon Krause in this case is being
 25 paid for by Clark County, Washington. I request that any check issued in payment of
 26

1 these fees be made payable to "Clark County, Washington," and I am filing a proposed
2 Order which includes this direction.

3 I declare under penalty of perjury under the laws of the State of Washington and
4 the United States of America that the foregoing is true and correct.

5 DATED this 5th day of March, 2013 at Tumwater, Washington.

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7 /s/ Guy Bogdanovich

8
9 Guy Bogdanovich

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**DECLARATION OF GUY BOGDANOVICH
IN SUPPORT OF DEFENDANTS' MOTION FOR
ATTORNEY FEES FOR MOTION TO STRIKE
SECOND SUPPLEMENTAL DISCLOSURE - 3**

Cause No: C11-5424 BHS

**LAW, LYMAN, DANIEL,
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